

Verification Procedures in the Minnesota State-Based Exchange

I. Introduction

The Minnesota Exchange will follow the processes for verifying applicant information established in 45 CFR 155.315 and 45 CFR 155.320 of the Exchange final rule. In general, these provisions direct the Exchange to maximize the use of available electronic data, and they are closely aligned with the verification provisions of the Medicaid and CHIP final rules. The Minnesota Exchange’s process for verifications in support of Medicaid and CHIP eligibility will comply with federal regulations at 42 CFR 435.940 – 960 and 42 CFR 457.380.

II. Verification Procedures

The following table summarizes the verification procedures that the Minnesota Exchange will use to support eligibility determinations for enrollment in a QHP and for insurance affordability programs.

These procedures are subject to change and refinement. Specific standards for determining reasonable compatibility and adjudicating paper documentation may change based on future federal guidance and decisions made by our State Legislature. Minnesota will develop a Medicaid/CHIP verification plan that describes verification policies and procedures using the required federal template when it is issued.

Category of Information	Medicaid/CHIP	Enrollment in a QHP, including APTC and CSR
Citizenship	SSA data match via the Federal Data Hub; if SSA cannot validate citizenship: <ul style="list-style-type: none"> • To the extent that an applicant has information that can be verified through DHS, DHS data match via the Federal Data Hub; • If unable to validate citizenship through SSA or DHS, request and adjudicate documentation in accordance with standards in Medicaid and CHIP regulations. 	SSA data match via the Federal Data Hub; if SSA cannot verify citizenship or status as a national: <ul style="list-style-type: none"> • DHS data match via Federal Data Hub; • If unable to verify citizenship through SSA or DHS, request and adjudicate paper documentation.
Immigration Status	DHS data match via the Federal Data Hub; if DHS cannot verify immigration status, request and adjudicate documentation in accordance with Medicaid standards.	DHS data match via the Federal Data Hub; if DHS cannot verify immigration status, request and adjudicate paper documentation.

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Residency	Accept self-attestation without further verification, subject to reasonable compatibility assessment with information provided on the application or in the records of the Exchange.	Accept self-attestation without further verification, except when not reasonably compatible with information provided on the application or in the records of the Exchange.
Age	Accept self-attestation without further verification	n/a
Household /Family Size and Household Composition	Accept self-attestation without further verification, subject to reasonable compatibility assessment with information provided on the application or in the records of the Exchange	Accept self-attestation without further verification if tax data represent accurate projection of family size. If data are unavailable or not an accurate projection, accept attestation unless not reasonably compatible with information provided on the application or in the records of the Exchange, with the exception of tax data. Adjudication of paper documentation, as necessary.
American Indian / Alaska Native Status	Accept self-attestation without further verification	n/a
Membership in a Federally-recognized Tribe	n/a	Data match with any electronic data sources available to the Exchange that have been approved by HHS for this purpose. Adjudication of paper documentation if no data sources are available, or as necessary to resolve inconsistencies.
Income (See section III for additional information)	Data match with IRS, SSA, and State Wage Information Collection Agency (SWICA) and State unemployment benefits agency as available to the Exchange. Use of other current income data sources if available. Collection of attestations from applicant, including explanations of discrepancies between attested income and electronic data. Standard rules and logic for assessment of reasonable compatibility, which will be in accordance with applicable Medicaid and CHIP regulations. At a	Data match with IRS, SSA, and SWICA and State unemployment benefits agency as available to the Exchange. Use of other current income data sources if available. Collect attestations from applicant, including explanations of discrepancies between attested income and electronic data. Assessment of reasonable compatibility and adjudication of paper documentation when necessary.

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	minimum, the reasonable compatibility standard will include assessing whether both the attested income and electronic data are both at, above or below the applicable Medicaid or CHIP MAGI standard. Other approaches to reasonable compatibility are under development.	
Incarceration	Data match with SSA Prisoner Update Processing System via the Federal Data Hub. Adjudication of paper documentation, as necessary.	Data match with SSA Prisoner Update Processing System via the Federal Data Hub. Adjudication of paper documentation, as necessary.
Public Minimum Essential Coverage (MEC)	n/a	Data match with Federal agencies via the Federal Data Hub.
Enrollment in Employer-Sponsored Minimum Essential Coverage	n/a	Accept self-attestation without further verification, except when not reasonably compatible with information provided on the application or in the records of the Exchange.
Eligibility for Employer-Sponsored Minimum Essential Coverage	n/a	Accept self-attestation, except when not reasonably compatible with information provided on the application or in the records of the Exchange. Possible verification with electronic data sources via Hub if available.

III. Additional Information on Income Verification Procedures

The Minnesota state-based Exchange intends to primarily rely on federal tax information (FTI) obtained from the Federal Data Hub to verify an applicant's income. When FTI is unavailable or the self-attested amount is not reasonably compatible with FTI information, Minnesota intends to follow the verification procedures listed below.

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Income Source	Verification Procedure
Wages	Accept self-attestation if reasonably compatible with the following electronic data sources (in hierarchy order). Adjudication of paper documentation, as necessary. <ol style="list-style-type: none"> 1. Online Payroll Verification Tool (Minnesota is currently in the process of obtaining this electronic data source.) 2. Minnesota Department of Employment and Economic Development (DEED) Quarterly Wage Data.
Interest/Dividends	Accept self-attestation if reasonably compatible. Adjudication of paper documentation, as necessary.
Alimony	Accept self-attestation if reasonably compatible. Adjudication of paper documentation, as necessary.
Social Security (Title II Benefits)	Accept self-attestation if reasonably compatible with benefit information received from SSA via the Federal Data Hub . Adjudication of paper documentation, as necessary.
Self-Employment	Accept self-attestation if reasonably compatible. Adjudication of paper documentation, as necessary.
Unemployment Compensation	Accept self-attestation if reasonably compatible with benefit information received from the Minnesota Department of Employment and Economic Development (DEED) . Adjudication of paper documentation, as necessary.
Taxable Scholarships, Awards and Grants	Accept self-attestation if reasonably compatible. Adjudication of paper documentation, as necessary.
Taxable Lump Sum Payments	Accept self-attestation if reasonably compatible. Adjudication of paper documentation, as necessary.
Other Taxable Income	Accept self-attestation if reasonably compatible. Adjudication of paper documentation, as necessary.